

REMARKS

By this Amendment, claims 1, 9, 12, 14, 16, 18 and 20 are amended to merely clarify the disclose invention. Claims 1-5, 8-12, 14, and 16-20 are pending. Reconsideration in view of the above amendments and following remarks is respectfully requested.

Claims 1-5, 8, 10, 12 and 14 were rejected under 35 U.S.C. 103(a) as being unpatentable over Freund (US 2003/0167405) in view of Kumar (US 2003100053089), claims 9, 16, 17 and 19 were rejected under 35 U.S.C. 103(a) as being unpatentable over Freund, Kumar and Schneier (US 2002/0087882), and claims 11, 18 and 20 were rejected under 35 U.S.C. 103(a) as being unpatentable over Freund and Sheikh (US 2002/0078382).

Applicant traverses the rejections because the cited prior art, analyzed individually or in combination, fails to disclose, teach or suggest all the features recited in the rejected claims. Moreover, one of ordinary skill in the art would not have combined Freund and Kumar.

**CITED PRIOR ART FAILS TO TEACH  
OR SUGGEST ALL CLAIM FEATURES**

For example, the cited prior art fails to disclose, teach or suggest the claimed invention wherein the personal firewall determines a current location of said client computer based solely on an Internet Protocol (IP) address currently used by the client computer.

In response to previously asserted arguments for patentability, the Office Action has now asserted that Freund teaches use of the IP address among network data to configure the firewall.

However, Freund fails to teach a personal firewall that determines a current location of the client computer based solely on an IP address. To the contrary, Freund actually teaches away from the claimed invention by stating that the IP address, as such, is insufficient to determine a client computer's location (see paragraph 30). Rather, Freund teaches using an Operating System (OS) network information Application Programming Interface (MI) to determine whether a network adapter (such as a modem, a network interface card, etc.) has been added or removed from the client device, or whether such an adapter's network configuration has changed. In other words, network characteristics are detected based on the network configuration information from a network adapter of a client device.

Kumar fails to remedy these deficiencies of Freund because Kumar merely teaches on the subject of an arrangement in which a client device on a network requests configuration

from a server. Thus, the combined teachings of Freund and Kumar fail to disclose, teach or suggest all the features recited in the rejected claims.

Similarly, Schneier fails to remedy these deficiencies of Freund and Kumar because Schneier merely teaches on the subject of a probe attached to a customer's network that collects status data and other audit information from monitored components of the network, looking for footprints or evidence of unauthorized intrusions or attacks and filters and analyzes the collected data to identify potentially security-related events happening on the network. Thus, the combined teachings of Freund, Kumar and Schneier fail to disclose, teach or suggest all the features recited in the rejected claims.

Finally, Sheikh fails to remedy these deficiencies of the other cited prior art because Sheikh merely teaches on the subject of a security software methodology and system that monitors configuration changes made to information systems within a network, which include applications including web servers, firewalls, proxy servers, log servers, intrusion detection software systems, routers and any other device or application which can be considered a part of the enterprise information system infrastructure. Thus, the combined teachings of the prior art fail to disclose, teach or suggest all the features recited in the rejected claims.

Accordingly the prior art rejections are traversed because the claimed features are not taught or suggested by any combination of the prior art.

**ONE OF ORDINARY SKILL WOULD NOT  
HAVE COMBINED FREUND AND KUMAR**

Applicant submits that claims 1-5, 8-10, 12, 14, 16-17 and 19 are patentable over the cited prior art because one of ordinary skill in the art would not have combined the teachings of Freund and Kumar as hypothesized by the Office Action.

Freund also fails to teach or suggest a firewall that verifies the determined location based solely on the IP address, using a request-response procedure with a predetermined network element selected based on the current IP address, prior to selecting security rules for that network. The Office Action has admitted this point but has asserted that Kumar remedies this deficiency. However, Freund teaches away from incorporating technology such as Kumar's.

Kumar merely discloses an arrangement in which a client device on a network requests configuration from a server. The server assigns an IP address to the client device and

sends the configuration information to the client, which is similar to conventional Dynamic Host Configuration Protocol (DCHP). Thus, Kumar merely teaches assigning a new IP address from a network. Nevertheless, this procedure is unsuitable for verification of a client device's location, which was determined based solely on the existing IP address of the client device.

Thus, modification of Freund's firewall based on the teachings of Kumar would not result in the claimed invention. Rather, Freund actually teaches that DCHP, or generally the dynamic assignment of IF address, is one factor which makes the IP address unreliable for determining a location of a computer. Thus, one of ordinary skill in the art would not have been motivated to combine the teachings of Freund and Kumar to produce the claimed invention.

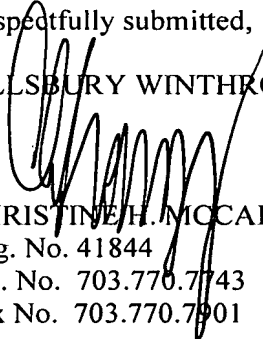
### **CONCLUSION**

In view of the above remarks, it is respectfully submitted that all of the claims are allowable and that the entire application is in condition for allowance. Should the Examiner believe that anything further is desirable to place the application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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